

# Exhibit 1

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ROBERT BARTLETT <i>et al.</i> ,	:	
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Plaintiffs,	:	<b>Case No. 19-cv-7 (CBA)(TAM)</b>
	:	
-against-	:	
	:	
SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN SAL	:	
<i>et al.</i> ,	:	
	:	
Defendants.	:	
-----X	:	

**PROPOSED DOCUMENT PRODUCTION ORDER**

Upon review of (1) Plaintiffs' First Request for the Production of Documents and Defendants' Responses and Objections thereto, (2) Plaintiffs' Motion to Overrule Defendants' Foreign Bank Secrecy and Scope/Burden Objections and Compel Defendants to Produce Documents Responsive to Plaintiffs' First Request for the Production of Documents; and (3) Defendants' Motion for Protective Order, each Defendant<sup>1</sup> is hereby ordered to produce the following records in accordance with the time frames specified in Plaintiffs' First Request for the Production of Documents:

1. All electronically maintained Transactional Records,<sup>2</sup> including SWIFT records and statements of accounts, for persons and entities listed in Exhibits 1 and 2 to Plaintiffs' First Request for the Production of Documents.
2. All electronically maintained Communications concerning persons and entities listed in Exhibits 1 and 2 to Plaintiffs' First Request for the Production of Documents to the extent that such persons and entities were ever customers of the Defendant.

<sup>1</sup> For purposes of this Order, Defendants are (1) Société Générale de Banque au Liban S.A.L., (2) Fransabank S.A.L., (3) MEAB Bank S.A.L., (4) BLOM Bank S.A.L., (5) Byblos Bank S.A.L., (6) Bank Audi S.A.L., (7) Bank of Beirut S.A.L., (8) Lebanon & Gulf Bank S.A.L., (9) Banque Libano-Française S.A.L., (10) Bank of Beirut and the Arab Countries S.A.L., and (11) Fenicia Bank S.A.L.

<sup>2</sup> For purposes of this Order, all capitalized terms have the definitions set forth in Plaintiffs' First Request for the Production of Documents.

3. All electronically maintained Account Opening Records concerning persons and entities listed in Exhibits 1 and 2 to Plaintiffs' First Request for the Production of Documents to the extent that such persons and entities were ever customers of the Defendant.
4. All electronically maintained Compliance Records concerning persons and entities listed in Exhibits 1 and 2 to Plaintiffs' First Request for the Production of Documents to the extent that such persons and entities were ever customers of the Defendant.
5. All paper or hard copy Compliance Records concerning persons and entities listed in Exhibits 1 and 2 to Plaintiffs' First Request for the Production of Documents to the extent that such persons and entities were ever customers of the Defendant, other than account opening documents.
6. All electronically searchable Communications concerning Hezbollah or its bloc in Lebanon's parliament known as "the Loyalty to the Resistance."

To the extent Defendants wish to seek permission of any Lebanese governmental authorities prior to producing records the Court has ordered to be produced, Defendants may, either jointly or separately, submit proposed Letters of Request or Letters Rogatory to this Court within 30 days of this Order and shall thereafter submit such Letters of Request or Letters Rogatory to the applicable Lebanese governmental authorities within 14 days of receiving the signed Letters of Request or Letters Rogatory from the Court.

This Order is issued without prejudice to either Plaintiffs' renewal of their efforts to obtain other records delineated in Plaintiffs' First Request for the Production of Documents in the future or any of Defendants' scope, burden or proportionality objections to the further records requested.

IT IS SO ORDERED.

Date:

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TARYN A. MERKL  
UNITED STATES MAGISTRATE JUDGE